

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re:)	Chapter 13
)	
Kenneth Joseph Woodard,)	Case No. 08-81442-TLS
)	
Debtor)	Adv. Pro. No. 21-08023-TLS
)	

Kenneth Joseph Woodard, on behalf of)	
himself and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
Navient Solutions, LLC and Navient Credit)	
Finance Corporation,)	<u>CIRCUITWIDE CLASS ACTION</u>
)	
Defendants.)	
)	
)	

PLAINTIFF'S MOTION TO MAINTAIN DOCUMENTS UNDER SEAL

1. Plaintiff, Kenneth Joseph Woodard, appearing both individually and on behalf of all similarly situated individuals, moves to file the Declaration of Jason W. Burge Submitting Evidence Regarding Class Certification and Exhibits there too contemporaneously with this Motion under seal. The Declaration and its Exhibits are requested to be filed and maintained under seal.

2. Portions of the documents contain confidential and proprietary information about Navient Solutions, LLC and Navient Credit Finance Corporation (collectively, "Defendants"), and that pertain to certain of Defendants' internal documents and policies.

3. To protect the confidentiality of these documents and information, it is necessary to not only file them under seal, but maintain that seal. Plaintiff therefore requests that, in order to protect these confidentiality interests, the Declaration and Exhibits be ordered to be maintained under seal.

WHEREFORE, based on the foregoing, Plaintiff requests that the Declaration and all papers, exhibits and documents attached thereto be maintained under seal in order to protect the confidentiality of Defendants' proprietary and confidential business information.

Dated: October 13, 2022.

Respectfully submitted,

/s/ Jason W. Burge

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of October, 2022, a true and correct copy of the forgoing was served via that Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned proceeding.

/s/ Jason W. Burge